
ARNOLD & PORTER LLP

October 4, 2004

Via E-Mail

Debra F. Edwards, Ph.D.
Director, Special Review and Reregistration Division
Office of Pesticide Programs
Registration Division, MC: 7508C
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Extension Request Comments on the Revised Comparative
Ecological Risk Assessment; Docket ID #OPP-2004-0033

Dear Debbie:

This letter is submitted on behalf of Reckitt Benckiser Inc. to request an extension of time to comment on the Revised Comparative Ecological Risk Assessment and related documents recently made available by the Agency. Reckitt Benckiser would like an additional 60 days during which to prepare and submit its comment.

Additional time will be needed to review carefully the Revised Comparative Ecological Risk Assessment and the various technical and other supporting documents. Further, Reckitt Benckiser personnel in other countries will be called upon to review and comment upon the lengthy materials made available by Agency staff and coordinating their input is likely to require additional time. Reckitt Benckiser personnel also might be asked to examine various files and the published literature to ensure that all the information available for consideration by Reckitt Benckiser commenters (and the Agency) have been considered.

Please contact me as soon as possible whether this request will be granted so we advise Reckitt Benckiser accordingly. I can be reached at 202/942-5477 (facsimile 202/942-5999) and via e-mail at lawrence_culleen@aporter.com.

Sincerely,

/s/

Lawrence E. Culleen
Counsel to Reckitt Benckiser Inc.

cc: opp-docket@epa.gov
Eileen Moyer, Reckitt Benckiser Inc.